

1 Law Office of G. Anthony Long
2 P. O. Box 504970, Second Floor Lim's Bldg.
3 San Jose, Saipan, MP 96950
4 Telephone No. (670) 235-4802
5 Facsimile No. (670) 235-4801

FILED
Clerk
District Court

OCT 12 2005

For The Northern Mariana Islands
By _____

Attorney for Defendant David Hutton, individually and in his personal capacity (Deputy Clerk.)

6 **IN THE UNITED STATES DISTRICT COURT**
7 **FOR THE**
8 **NORTHERN MARIANA ISLANDS**

9 KAREN LYNWOOD SEVERY

) **CIVIL ACTION NO. 05-0020**

10 Plaintiff

11 v.

12 COMMONWEALTH OF THE NORTHERN)
13 MARIANA ISLANDS, OFFICE OF THE)
14 ATTORNEY GENERAL; DAVID HUTTON)
15 individually and in his capacity as a)
16 supervisory employee of the Office of the)
17 Attorney General and the Commonwealth of)
18 Northern Mariana Islands; and DOES 1 - 10,)
19 inclusive)

Defendants

) **RULE 26 DISCOVERY DISCLOSURES**

) **DATE: OCTOBER 17, 2005**

) **TIME: 10:00AM**

) **JUDGE: ALEX R. MUNZON**

20 Comes now defendant David Hutton ("Hutton") who submits the following pre-
21 discovery disclosure:

22 **A. PERSONS WITH DISCOVERABLE INFORMATION:**

23 In addition to each off the parties, persons known to Hutton with discoverable
24 knowledge include but are not limited to the following:

25 Pamela Brown, Esq.
26

Attorney General
Office of the Attorney General
2nd Floor Administration Building
Capitol Hill, Saipan, MP 96950
(670) 664-2341

Clyde Lemons, Jr., Esq.
Deputy Attorney General
Office of the Attorney General
2nd Floor Administration Building
Capitol Hill, Saipan, MP 96950
(670) 664-2341

Ed Buckingham, Esq.
Assistant Attorney General
Office of the Attorney General
2nd Floor Administration Building
Capitol Hill, Saipan, MP 96950
(670) 664-2341

Benjamin Sachs, Esq.
Former Assistant Attorney General
Civil Division
(Current Address unknown)

Alex Shapiro, Esq.
Former Assistant Attorney General
Criminal Division
(Current Address unknown)

Grant D. Sanders, Esq.
Former Assistant Attorney General
Criminal Division
(Current Address unknown)

Janine Udui
Assistant Attorney General
Criminal Division
Civic Center
Susupe, Saipan, MP 96950
(670) 664-2366

Jeff Warfield, Esq.
Assistant Attorney General
Criminal Division
Civic Center
Susupe, Saipan, MP 96950
(670) 664-2366

LAW OFFICE OF G. ANTHONY LONG
P.O. Box 504970, 2nd Floor Lim's Building
San Jose, Saipan, MP 96950
Tel No: (670) 235-4802 Fax No: (670) 235-4801

1 Rebecca Warfield, Esq.
2 Assistant Attorney General
3 Criminal Division
4 Civic Center
5 Susupe, Saipan, MP 96950
6 (670) 664-2366

7 Heather Barcinas
8 Administrative Assistant
9 Office of the Attorney General
10 Criminal Division
11 Civic Center
12 Susupe, Saipan, MP 96950
13 (670) 664-2366

14 Clarinda Castro
15 Administrative Assistant
16 Office of the Attorney General
17 Criminal Division
18 Civic Center
19 Susupe, Saipan, MP 96950
20 (670) 664-2366

21 Ester San Nicolas
22 Administrative Assistant
23 Office of the Attorney General
24 Criminal Division
25 Civic Center
26 Susupe, Saipan, MP 96950
27 (670) 664-2366

28 Frieda Demapan
Administrative Assistant
Office of the Attorney General
Criminal Division
Civic Center
Susupe, Saipan, MP 96950
(670) 664-2366

Blumel Ada
Victim's Advocate
Office of the Attorney General
Criminal Division
Civic Center
Susupe, Saipan, MP 96950
(670) 664-2366

Wilfred Villagomez

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P.O. Box 504970, 2nd Floor Lim's Building
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1 Administrative Officer
2 Office of the Attorney General
3 Criminal Division
4 Civic Center
5 Susupe, Saipan, MP 96950
6 (670) 664-2366

7 Joseph DLG Taijeron, Esq.
8 Assistant Attorney General
9 Department of Public Safety
10 Civic Center, Susupe, Saipan, MP 96950
11 (670) 664-9000

12 Massod Karimapour, Esq.
13 Public Defender
14 Office of the Public Defender
15 Civic Center, Susupe, Saipan, MP 96950
16 (664) 234-6215

17 Bertha Camacho
18 Administrative Assistant
19 Office of the Public Defender
20 Civic Center, Susupe, Saipan, MP 96950
21 (664) 234-6215

22 Diane Cabrera, Esq
23 Law Office of Edward Manibusan
24 P.O. Box 7934 SVRD
25 Saipan, MP 96950
26 (670) 235-6520

27 Jesus R. Matagolai
28 Acting Director of Personnel
Office of the Governor
Office of Personnel Management
P. O. Box 5153 CHRB
Saipan, MP 96950
(670) 234-6925

AJ Tusa
New Orleans, La
(current address unknown).

Henry Pleasant
New Orleans, La
(current address unknown)

B. DESCRIPTION AND LOCATION OF RELEVANT DOCUMENTS:

The documents possessed by Hutton relevant to his defenses in this lawsuit are as follows:

Employment Contract of David Hutton as Chief Prosecutor

June 23, 2004 Report of OPM Investigation of Severy complaint against Hutton

June 23, 2004 Report of OPM Investigation of Cabrera complaint against Hutton

Transcript of May 13, 2004 Interview of Hutton in connection with Severy complaint

April 22, 2004 Memorandum from Attorney General to Karen Severy, Re re-assignment

March 8, 2004 memo from Attorney General to Hutton re: Byrne Grant re- assignment

March 8, 2004 memo from Hutton to Criminal Division Re: Byrne Grant re- assignment

September 23, 2003 memo from Severy to Hutton re: Office Problems/Issues

February 23, 2004 email from Severy to Pam Brown re; Order to Show Cause

Resume of Karen Severy

Emails of Alex Shapiro

Emails to and from Hutton and the Attorney General

Documentation possessed by the Commonwealth of the Northern Mariana Islands which Hutton believes to be relevant to his defense include the following:

Severy's personnel file

Severy's employment contract

1 The letter terminating Severy's employment with the Attorney General's Office
2 The entire OPM investigation file of Severy's complaint
3 Internal correspondence and communication between the Attorney General and attorneys of the
4 Attorney General's Office.
5 Internal correspondence and communication between attorneys of the Attorney General's
6 Office.

7
8
9 **C. EXPERT WITNESSES:**

10 Hutton has not made a determination as to whether he will use an expert witness in this
11 case.

12
13
14 **D COMPUTATION OF DAMAGES:**

15 Hutton is unaware of any specific damages, if any, actually suffered by plaintiffs.

16
17 **E. INSURANCE**

18 Hutton does not possess any insurance coverage for the claims alleged in this lawsuit. However,
19 the claims are subject to coverage by 7 CMC § 2301 *et seq.*
20
21

22 Dated this 12th day of October, 2005.

23 Law Office of G. Anthony Long

24 By: 

25 G. Anthony Long
26
27
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